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September 4, 2015

Honorable Laura Taylor Swain
United States District Judge
United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Ottah v. BMW, et al.*
Civil Action No. 1:15-cv-02465-LTS

Dear Judge Swain:

Defendants FCA US LLC, Ford Motor Company, Hyundai Motor America, Jaguar Land Rover North America, LLC, Kia Motors America, Inc., Toyota Motor Corporation, General Motors LLC, Mazda Motor Corporation, Fuji Heavy Industries, Ltd., and Nissan Motors Co. Limited (collectively, "Defendants") jointly request that the Court stay the initial pre-trial conference currently scheduled for October 9, 2015.

As the Court may recall, during a July 16, 2015 pre-motion conference, Defendants received permission to file dispositive motions in response to Mr. Ottah's anticipated Second Amended Complaint. The Court also invited the parties to seek a stay of the initial pre-trial conference if Defendants filed such dispositive motions. Mr. Ottah filed his Second Amended Complaint on July 29 (Dkt. No. 89), and Defendants filed dispositive motions on August 20 and 26 (Dkt. Nos. 90 and 103, respectively), in accordance with the briefing schedule set forth in the Court's July 16 Order. Thus, Defendants respectfully submit that a stay of the initial pre-trial conference is appropriate in view of the pending dispositive motions. The initial pre-trial conference can be rescheduled, if necessary, after the Court has heard and ruled on the pending dispositive motions.

Defendants telephoned Mr. Ottah on September 3 to discuss this request. Mr. Ottah does not consent to this request.

Respectfully,

/s/Turner P. Smith

Turner P. Smith
Counsel for Toyota Motor Corporation

cc: Mr. Chikezie Ottah (By Mail and E-mail: eddyottah@yahoo.com)
All Counsel of Record (By CM/ECF)